

## REMARKS

This is intended as a full and complete response to the Office Action dated October 4, 2004, having a shortened statutory period for response set to expire on January 4, 2005. Please reconsider the claims pending in the application for reasons discussed below.

### Objections to the Disclosure

The Examiner objects to the disclosure because of the following informalities: “using NLSID without spelling it out, at least on first usage therein.” NLSID is not spelled out because the string of characters is being used merely as an arbitrary handle for an attribute for an element of markup language content. For example, Figure 6 illustrates exemplary HTML content that uses an “NLSID=userid” attribute associated with a “label” element of the HTML content.

However, any arbitrary text string could be used to name the attribute for the label. Accordingly, as paragraph 35 of the specification provides: “Although an NLSID is disclosed in the present exemplary embodiment, the present invention contemplates using essentially any attribute that may be associated with an element whose contents are to be translated.” Once selected, the attribute is used to identify markup elements that include text to be translated, and instances of the attribute are distinguished using a index value associated with the attribute (e.g., the “userid” key value illustrated in Figure 6). In the interest of clarity, however, Applicant has amended the first use of the “NLSID” attribute term to make clear that it is being used to identify an attribute of a markup language element.

The Examiner objects to the drawings as failing to comply with 37 CFR 1.84(p)(5) because they do not include the following reference sign(s) mentioned in the description: Figure 3, element 30. A corrected drawing sheet is submitted with this response.

In the specification, the paragraphs 35, 37, and 44 have been amended to correct minor editorial problems. Claims 1-44 are pending in the application. Claims 1,

3-5, 7-9, 11-18, 21-22, 24-35, 37, 40- 41, 43- 46, remain pending following entry of this response. Claims 1, 3-5, 8, 12-13, 16-18, 22, 24-25, 27, 29-32, 35, 37, 41, and 43 have been amended. Claims 2, 6, 10, 19-20, 23, 36, 38-39, and 42 have been cancelled. New claims 45-46 have been added to recite aspects of the invention.

In the drawings, Figure 4 has been amended so that the text shown in box 42 corresponds to the description of this element in the specification. Applicant submits that neither the amendments nor new claims introduce any new matter.

#### Claim Objections

The Examiner objects to claims 2, 6, 8, 13, 17, 19, 20, 23, 27, 29, 32, 36, 38, 39, 42, and 43 are objected to because of the following informalities: using NLSID without spelling it out, at least on first usage therein. As described above regarding references to "NLSID" in the disclosure, the term "NLSID" refers to an attribute of an element of markup language in a web page. Applicant has amended the claims accordingly.

The Examiner objects to claim 10 under 37 CFR 1.75(c), as being of improper dependent form for failing to further limit the subject matter of a previous claim. Applicant has cancelled claim 10 as part of this response.

#### Claim Rejections - 35 USC § 102

Claims 1-8, 10-11, 13-29 and 31-44 are rejected under 35 U.S.C. 102(e) as being anticipated by *Parasnis et al.* (2001/0044809, hereinafter *Parasnis*).

Applicant respectfully traverses this rejection. *Parasnis* discloses a method for localization of objects in markup language documents. *Parasnis* teaches using "placeholder variables" that are ultimately replaced with text strings retrieved from a .dll file associated with Powerpoint 2000®, an application installed on the user's computer system.

Applicant asserts that the "placeholders," as disclosed by *Parasnis*, and the predetermined parameter with an attribute and value used to index into an indexable

dictionary file, as claimed by Applicant, are not the same. Specifically, *Parasnis* discloses the use of placeholders used in conjunction with a Powerpoint 2000® broadcast presentation. For example, in paragraph 36, *Parasnis* provides:

The logic then flows to a block 154, wherein a flag in a dynamic link library called PPINTL.dll (i.e., the POWERPOINT® International dll file) is set, indicating the selected language. In response to receiving the flag, POWERPOINT 2000 ® extracts an appropriate set of localized strings in the specified language from PPINTL.dll, and writes these strings into a reference file called global.js using UTF8 formatting, as indicated by a block 156. As described in further detail below, the global.js reference file comprises a plurality of name-value pairs that link objects referenced in the HTML document to localized objects. During a pre-rendering operation of the HTML document (e.g., when the HTML document is initially loaded by a browser), the placeholder values in the HTML document are replaced with localized objects based on the name-value pairs in the global.js reference file, as provided by a block 158. As a result, when the document is rendered in a block 160, objects localized to the specified language are rendered, thereby conveying content in the specified language. *Parasnis* ¶ 36.

The actual translation values for the “placeholder” are “entered by the user when scheduling a presentation broadcast, *Parasnis* ¶ 43, and written out to a separate file (global.js) each time a user interacts with the system as disclosed by *Parasnis*. The text strings in the global.js file are used to replace the placeholders. The text strings from the replacement file are retrieved from a ppintl.dll file. *Ibid*. This .dll file is associated with the Powerpoint 2000 application. Alternatively, text strings may be retrieved using environment variables defined for the Powerpoint 2000 application, see *Parasnis* ¶¶ 43-44.

The Examiner asserts that by teaching replacing placeholder values with localized objects based on the global.js reference file, *Parasnis* ¶ 37, *Parasnis* teaches inserting entries corresponding to translations of the content in the source web page into an indexable file. However, replacing placeholder values with objects with localized strings stored in a Powerpoint 2000 ppintl.dll file, written out to a global.js file, fails to teach inserting entries into an indexable dictionary file, as claimed by Applicant.

Further, the Examiner asserts that *Parasnis* teaches using a dictionary driven stylesheet by using “cascading stylesheets to localize media objects comprising aural messages in a specific language.” *Parasnis*, ¶ 65. Cascading Style Sheets are used to describe how a document is displayed or printed. For example, a CSS sheet may be associated with an HTML document, to influence its layout when accessed via a browser. *Parasnis*, ¶ 51. Thus, cascading stylesheets affect style and display preferences, not content. In contrast, Applicant claims using a style sheet transformation (e.g., an XSL Stylesheet transformation) applied to a source web page to generate a target web page containing a translation of content, wherein, the translations are retrieved from entries in an indexable dictionary file. This is different from using a cascading stylesheet (e.g., a CSS stylesheet) to apply display and formatting preferences, or to select “to localize media objects comprising aural messages” in the indexable dictionary file. *Parasnis*, ¶ 50. Accordingly, *Parasnis* fails to teach using dictionary driven stylesheet transformations as claimed by Applicant.

Accordingly, *Parasnis* as fails to teach show or suggest the claimed invention, Applicant respectfully requests that the rejection regarding claims 1-8, 10-11, 13-29 and 31-44 be withdrawn and these claims be allowed.

Regarding claims 3-11, 24-30, 32-35, 37, 40, 43 and 44, each of these claims depends from one of independent claims 1, 22, 31, or 41. Because Applicant believes to have traversed this rejection regarding independent claims 1, 22, 31, and 41, Applicant asserts that the rejection as applied to these dependent claims is also traversed without the need for further remarks.

Regarding claim 12, the Examiner did not include claim 12 in listing the claims rejected under 35 U.S.C. § 102(e) under *Parasnis* at the beginning of section 6 of the Office Action. However, a rejection of claim 12 is included in section 6. At the same time, in Section 8, the Examiner rejects claim 12 under 35 U.S.C. § 103(a) under *Parasnis* in view of *Jakubowski* (U.S. Publication 2002/0143821). Applicants request that the Examiner clarify the rejection of claim 12, and associated dependent claims 13-20. To the extent that the Examiner rejects claim 12, and associated dependent claims

13-20 based on *Parasnis*, Applicant believes that for the reasons set forth above, the rejection for this claim is also traversed without the need for further remarks.

#### Claim Rejections - 35 U.S.C. § 103

Claims 9, 12, and 30 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Parasnis* in view of *Jakubowski* (2002/0143821). Applicant respectfully traverses this rejection.

Regarding claims 9 and 30, because Applicant believes to have traversed the rejection regarding independent claim 1 and 22, respectively, Applicant asserts that the rejection as applied to dependents claim 9 and 30 is also traversed. Therefore, Applicant submits that claims 9 and 30 are patentable over *Parasnis* in view of *Jakubowski*. Withdrawal of the rejection is respectfully requested.

Regarding claim 12, refer to the remarks in the pervious section regarding the rejection of this claim under 35 U.S.C. § 102.

#### Conclusion

The secondary references made of record are noted. However, it is believed that the secondary references are no more pertinent to the Applicant's disclosure than the primary references cited in the office action. Therefore, Applicant believes that a detailed discussion of the secondary references is not necessary for a full and complete response to this office action.

Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully requests that the claims be allowed.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'G. McClellan', is written over a horizontal line.

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**IN THE DRAWINGS:**

The attached sheet of drawings includes changes to Fig. 3. This sheet, which includes Figs. 2-3, replaces the original sheet including Figs. 2-3.

Figure 4 has been amended so that the text shown in box 42 corresponds to the description of this element in the specification. A replacement sheet which includes Figs. 4-5, replaces the original sheet including Figs. 4-5, is attached.

**Attachment: Replacement Sheet**